

SEALED**FILED**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

SEP 11 2024

UNITED STATES OF AMERICA,

Plaintiff,

v.

JERRY BRANDON PEARCE,

Defendant.

SEALED

By _____

BONNIE HACKLER
Clerk, U.S. District Court

Deputy Clerk

Case No. **24 CR 150 RAW****INDICTMENT**

The Federal Grand Jury charges:

COUNT ONE**FELON IN POSSESSION OF FIREARM AND AMMUNITION**

[18 U.S.C. §§ 922(g)(1) & 924(a)(8)]

On or about September 4, 2023, in the Eastern District of Oklahoma, the defendant, **JERRY BRANDON PEARCE**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting commerce, a firearm and ammunition, to wit:

- one (1) Anderson MFG, model AM-15, .223/5.56 caliber semi-automatic rifle, bearing serial number 11014030196;
- one (1) Glock, model 22, .40 caliber semi-automatic pistol, bearing serial number KME584; and
- six (6) rounds of 40 caliber ammunition and six (6) rounds of 223 caliber ammunition. The six (6) rounds of 40 caliber ammunition consists of four (4) rounds of Winchester (WIN) branded ammunition and two (2) rounds of Giulio Fiocchi, Lecco (G.F.L.) branded ammunition. The six (6) rounds of 223 caliber ammunition consists of two (2) rounds of Eldorado Cartridge Corporation (PMC) branded ammunition, two (2) rounds of Lake City Army Ammunition plant (L C) branded ammunition and two (2) rounds of Winchester branded ammunition.

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TWO

POSSESSION OF AN UNREGISTERED FIREARM (DESTRUCTIVE DEVICE)
[26 U.S.C. §§ 5845, 5861(d), and 5871]

On or about September 4, 2023, in the Eastern District of Oklahoma, the defendant, **JERRY BRANDON PEARCE**, did knowingly possess a destructive device, which is a firearm, as defined in Title 26, United States Code, Section 5845, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5845, 5861(d), and 5871.

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d), 26 U.S.C. § 5872, & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One and Two of this Indictment, involving violations of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8), and Title 26, United States Code, Sections 5845, 5861(d), and 5871 the defendant, **JERRY BRANDON PEARCE**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), all firearms, ammunition, and destructive devices involved in the commission of the offenses, including, but not limited to:

- one (1) Anderson MFG, model AM-15, .223/5.56 caliber semi-automatic rifle, bearing serial number 11014030196;
- one (1) Glock, model 22, .40 caliber semi-automatic pistol, bearing serial number KME584;
- approximately six (6) rounds of 40 caliber ammunition and six (6) rounds of 223 caliber ammunition. The six (6) rounds of 40 caliber ammunition consists of four (4) rounds of Winchester (WIN) branded ammunition and two (2) rounds of Giulio Fiocchi, Lecco (G.F.L.) branded ammunition. The six (6) rounds of 223 caliber ammunition consists of two (2) rounds of Eldorado Cartridge Corporation (PMC) branded ammunition, two (2) rounds of Lake City Army Ammunition plant (L C) branded ammunition and two (2) rounds of Winchester branded ammunition; and
- one (1) destructive device, described as an improvised explosive grenade, and its components.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney



RICHARD J. LORENZ, PA Bar # 314423
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY